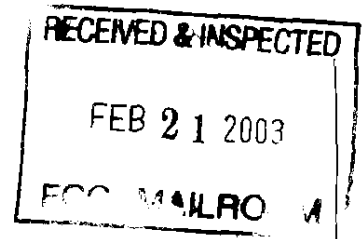


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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554



PETITION FOR RULE CHANGE

Petitioner: )  
 )  
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RM DOCKET NUMBER \_\_\_\_\_

**Changes Requested in Part 13**

This request for a rule making "RM" is to correct a long standing policy change the commission made back in the 1970s or 1980's era of de-regulation the commission set forth.

In the past the commission had required the repair man of radio equipment to be under FCC control with a First Class or Second Class FCC radio telephone or Telegraph license's. The commission reviewed the rule and de-regulated the rule so that some person repairing or operating equipment would not have to hold the license, this was to allow the Federal government from getting out of the Exam Business. In the de-regulation due to international requirement some licenses would still be required and the commission "FARM-ED" the exam out to private vendors that had a interest in still seeing that the exam were given in a fair and honest way.

At one time Citizen Band radio equipment required the repairs to be made by the original factory of manufacture, or by the holder of some of the Commercial Licenses the FCC required. This policy was the best step in real field level enforcement by private business a repairman who was subject to loss of job, as well as subject to FCC inspection made sure that the repair was up to FCC inspection, and that the station he was dealing with had a FCC station license. This old policy was the first one of fair and logical reasons for FCC control. The cost to the commission was the cheapest form of enforcement on a local case by case end user!

Because the "CB" band, Citizen Band, and the "Illegal" **EXPORT CB/HAM** radio have cause so much trouble with enforcement it is time the Commission should re-visit the issue of requiring the licensing or special permit's to person repairing the various segments of bands the commission is having enforcement troubles with. The de-regulations era has not worked in all area communications.

The simple rule change would be to re-word part 13 to state that stations operating between in fcc sub parts 90 & 95 [Both]. and also between 25 Mhz and 35 Mhz must comply with international standard and be only repaired by persons holding Several Type's] of Classes of FCC Commercial License's or Permit's.

Now to address the current fellows out there who don't hold the class licenses or permit that the FCC should or may require. In the original drafting of this change it must be taken into consideration there are a vast number of persons employed everyday in the repair of this communications equipment. The commission at the time of this "stressed private certification" through various private education and engineering groups. To "Grandfather" to a license in the "CE" Commercial Exam process would be a mass problem! So the best thing would be to Make a "Conditional Permit" for Commercial Radio telephone for person active engaged in this kind of work. This would allow the "Conditional Permit" to still be employed and still under FCC permit controls. The application for this "Conditional Permit" should only be through a "CE" Commercial Exam Station, with the need-ed "Proof's" to qualify for the permit. The educational or work related requirements would be drafted by the WTB in a public notice and the limited scope of what service could be did with the permit would also be drafted in the future. After a fixed (future date in the WTB] draft the "Grandfathering of the past radio repairman would stop! The real name for the permit could be the future permit could be like **"Second Class Conditional GROL Permit"**

The important thing the commission would address is that this Second Class Conditional GROL Permit in a one time issued permit, without a grace period to make application after a fixed date. Renewal of the permit would be required it should not be life time. A very large FCC fee should be changed for the paperwork and review, checking that would be required! The application again should only be through a "CE" exam station a fee of equal value to the common GROL exam may be also split by the "CE" to offset the processing of paperwork. The "CE" would be required to "Stress" the advantage of taking the exam for the life time advantage of the applicant.

Repair Shops would be required to post there Commercial FCC licensed employees as in the past for public inspection.

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Rules would be drafted to in the various parts the FCC would like to require this option in the future. This is a first step.

Exempt from this requirement would be Ham's [Amateur Radio Licensee's] when exclusively using only Ham [Amateur Radio] frequency's. Direct Employee's of the Federal Government in the exclusive duty's associated with radio. Because 25 Mhz 30 Mhz is still addressed as HF international frequencies in most all radio services it is well within the scope of enforcement have only license person repairing radio in this area

The easy way is to "Grandfather" with the proper "Proofs" person working now to the Temporary type of permit to repair, checked and verified by both the "CE" and "FCC", and require future Licensing by a exam under the current structure to be fair.

Public input as how to resolve the issue of "Export CB" radio controls is needed to re-establish licensing or permit use a future event.

Thanks,

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